

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH SIMMONS,	:
	:
	:
Plaintiff,	:
	:
	:
v.	Civil Action
	No. 22-1644
	:
CITY OF PHILADELPHIA, et al.,	:
Defendants.	:

**JOINT SUBMISSION OF THE PARTIES
PURSUANT TO THE COURT'S November 15th ORDER**

- 1. Status of Discovery** - the parties have made substantial progress in negotiating ESI search terms. The parties are awaiting an update on the quantity of data that will be returned for negotiated terms and plan to confer in early January. Once the negotiated preliminary results are received, the parties will confer again to determine if additional negotiation is necessary before production can begin. Since that meeting, Defendants have produced approximately 5,800 additional documents pursuant to a confidentiality agreement by and between counsel. Counsel for the Plaintiff will continue to review the provided discovery and communicate with counsel regarding any further discovery needs.
- 2. Depositions:** Plaintiff's deposition is scheduled for January 8, 2025. Dates have been set aside in early February for depositions to be conducted by Plaintiff.
- 3. Outstanding discovery:** ESI will be completed by the end of February 2025 and will be provided on a rolling basis.

Date: January 6, 2025

Respectfully submitted,

/s/ Nia Holston
Nia Holston, Esquire
Attorney for Plaintiffs

/s/ Kathryn Faris
KATHRYN FARIS
Senior Attorney
City of Philadelphia Law Department